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May 09, 2017

The Honorable Scott Pruitt
Administrator U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW Washington, DC 20460

Dear Administrator Pruitt:

I represent sugarbeet growers in North Dakota. Constituents in North Dakota, Michigan, and Minnesota are planting 779,000 acres of sugar beets this year, which is sixty-nine percent of the total sugar beet acreage in the United States. The sugar beet industry has a combined economic impact of \$6,500,000,000 in these states. I write today in strong support of the Section 18 requests made by the North Dakota Department of Agriculture and the Minnesota Department of Agriculture, for the emergency use of chlorothalonil to combat *Cercospora beticola*, which causes Cercospora leaf spot (CLS). I understand the Michigan Department of Agriculture will file a Section 18 request with EPA soon.

CLS attacks sugar beets and causes a dramatic loss in sugar content before and after harvest. In 2016 alone, CLS caused sugar beet growers in North Dakota, Michigan, and Minnesota to lose an estimated \$328,200,000. The sugar beet growers in these states are facing a crisis because CLS has developed increased resistance to the currently registered fungicides. The resistance data is well documented in the Section 18 emergency exemption requests submitted by the North Dakota and the Minnesota Departments of Agriculture.

The Section 18 requests to both state departments of agriculture were originally requested jointly late in 2016 by agricultural research scientist Dr. Mohammed Khan with joint positions at North Dakota State University and the University of Minnesota. The requests were made to both state departments of agriculture jointly following past practice and because the production areas are contiguous along the borders of both states. However, this year, after Dr. Kahn submitted the information, he was asked to revise the submission and submit them individually with state specific information, causing an unexpected and untimely delay. The North Dakota Department of Agriculture submitted their Section 18 request to EPA on March 3, 2017. The Minnesota Department of Agriculture submitted their request to EPA on April 6, 2017. Both states have now been asked by EPA to withdraw their Section 18 requests because of a desire for more data. I understand that additional data has been submitted to EPA since the withdrawal requests were made. The new data should be weighed with the impending economic crisis caused by this outbreak in mind. Dr. Khan also submitted a request to the Michigan Department of Agriculture in late April of 2017. The Michigan Department of Agriculture has not yet submitted their Section 18 request to EPA.

Chlorothalonil (Cercos – Chloronitrile, broad spectrum) is the only fungicide identified by agricultural research scientists that can be used this season as a previously unavailable tank mix partner to help overcome this outbreak of resistant CLS. **Time is of the essence.** The 779,000 acres of sugar beets in all three states are at severe risk. Without the emergency exemption for chlorothalonil, the losses for 2017 are expected to be much greater than the \$328,200,000 suffered in 2016 because of the high level of overwintering spores of CLS in infected leaf debris that remains in the growing regions. In order to allow enough time for an adequate supply of chlorothalonil to be manufactured, Section 18 emergency exemption would need to be granted by mid-May of 2017. Growers will start fungicide application around the end of June to early July.

Chlorothalonil is labeled for use on more than 60 crops in the United States and is one of the most widely used fungicides in the US. It is used on potatoes, peanuts, tomatoes, lettuce, onion, cabbage and numerous fruit trees including plums, cherry, apricot, peaches. All of these farmers and their commercial applicators have certifications and experience in handling and applying fungicides for many years. Specifically, many of the farmers have experience in applying chlorothalonil to their potatoes and other crops that they grow in rotation with sugar beets. The agriculture community will continue to advise growers and applicators on best practices to avoid inhalation of this product, especially when adding the product to the spray tank. Closed cab tractors with proper filtration systems have reduced human exposure to pesticides like chlorothalonil. Spray nozzle selection has also improved in recent years to help minimize drift.

Farmers are facing historically low prices across the board on the commodities they grow and many may not be able to continue growing sugar beets if losses from CLS continue. I appreciate your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, reading "Kevin Cramer". The signature is fluid and cursive, with the first name "Kevin" and last name "Cramer" clearly distinguishable.

Kevin Cramer
Member of Congress